UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN

JEFFREN ALIAN SNOWDENT MOOC# UK (Enter above the full name of the plaintiff(s), including prisoner number, in this action. If you cannot list all plaintiffs in the space provided, please write "see attached" and list all names on an additional page.) v.	FILED - GR December 10, 2021 12:26 PM CLERK OF COURT U.S. DISTRICT COURT WESTERN DISTRICT OF MICHIGAN
BARRY COUNTY JAIL	BY:JMW SCANNED BY: 18 17
DR. ANDREW MESSENGER	-
BR. WALTER ALBRECHT	1:21-cv-1046 Phillip J. Green
JUDGE MICHEAL SCHIPPER	U.S. Magistrate Judge
(Enter above the full name of the defendant(s) in this action. If you cannot list all defenda in the space provided, please write "see attached" and list all names on an additional page COMPLAINT (Print Clearly)	nts e.)
I. Previous Lawsuits CAUTION: The Prison Litigation Reform Act has resulted in substantial change to initiate lawsuits in federal courts without prepayment of the civil action filing are required concerning your litigation history. Generally, a plaintiff's failure to questions set forth below will result in denial of the privilege of proceeding in the entire \$402.00 filing fee regardless of whether your complaint is dismissed.	g fee. Accurate and complete responses of accurately and completely answer the forma pauperis and require you to pay d.
A. Have you ever filed a lawsuit while incarcerated or detained in any prison	
B. If your answer to question A was yes, for each lawsuit you have filed y below. Attach additional sheets as necessary to answer questions 1 thro	ou must answer questions 1 through 5 ugh 5 below with regard to each lawsuit.
 Identify the court in which the lawsuit was filed. If it was a state co was filed. If the lawsuit was filed in federal court, identify the district 	ct within which the lawsuit was filed.
V.S. DISTRICT COURT FOR THE WE	STERN DISTRICT OF MICHER
2. Is the action still pending? Yes □ No 🕱	22.50
a. If your answer was no, state precisely how the action wa	as resolved: DISMISSED BY
3. Did you appeal the decision? Yes □ No 🛣	
 Is the appeal still pending? Yes □ No □ a. If not pending, what was the decision on appeal? 	
Was the previous lawsuit based upon the same or similar facts as a. If so, explain:	

II. Parties

A. Plaintiff(s)
Enter your name, place of confinement, address, and place of confinement during the events described in the complaint in the blanks below. Provide the same information for any additional plaintiffs. Attach extra sheets as necessary.
Name of Plaintiff JEFFREY ALLAN SNOW DEN IT
Place of Present Confinement BARRY COUNTY JAIL
Address 1212 W. STATE ST. HASTINGS, MI 49058
Place of Confinement During Events Described in Complaint BARRY COUNTY JAIL
B. Defendant(s)
Complete the information requested below for each defendant in this action, including whether you are suing each defendant in an official and/or personal capacity. Provide the same information for each additional defendant. If there are more than six defendants attach extra sheets as necessary.
Name of Defendant #1 BARRY COUNTY JAIL
Position or Title COUNTY JAIL
Place of Employment BARRY COUNTY JAIL
Address 1212 W. STATE ST. HASTINGS, MI 49058
Official and/or personal capacity? OFFICIAL
Name of Defendant #2 DR. ANDREW MESSENGER
Position or Title AL PHYSICIAN
Place of Employment RARRY COUNTY JAIL
Address 1212 W. STATE ST. HASTINGS, MI 49058
Official and/or personal capacity? OFFICIAL
Name of Defendant #3 DR. WAUTER ALBRECHT
Position or Title JAL PHYSICIAN
Place of Employment BARRY COUNTY JAIL
Address 1212 W. STATE ST. HASTINGS, MI 49058
Official and/or personal capacity? OFFICIAL
Name of Defendant #4 MICHEAL SCHIPPER
Position or Title BARRY COUNTY DISTRICT JUDGE
Place of Employment BARRY COUNTY DISTRICT COURT
Address 204 W. COURT ST. HASTINGS, MI 49058
Official and/or personal capacity? <u>OFFICIAL</u>
Name of Defendant #5
Position or Title
Place of Employment
Address
Official and/or personal capacity?

State here the facts of your case. Describe how each defendant is personally involved. Include also the names of other

III. Statement of Claim

persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend allege a number of related claims, number and set forth each claim in a separate paragraph. Do not include unrelate claims. Use as much space as you need. Attach extra sheets if necessary.
DENIAL OF ADEQUATE MEDICAL CARE
DUE TO THE LENGITH OF MY STATEMENT I CHOSE TO WRITE THE ENTIRE CLAIM ON EXTRA SHEETS OF PAPER WHICH I HAVE INCLUDED WITH THIS FILING.
* NOTE FOR THE JUDGE:
ON NOVEMBER 30th 2021 I SENT A REQUEST VIA THE COBREA RESIDENT KIOSK HERE IN PARRY COUNTY JAIL TO JAIL STAFF ASKING FOR COPIES OF THE ELECTRONIC KITES BETWEEN MEDICAL STAFF AND MYSELF, 100 I PLANNED TO INCLUDE THEM AS SUPPORTING EVIDENCE, MY REQUEST WAS DEVIED AND I WAS TOLD THAT I WOULD HAVE TO FILE A F.D.I.A REQUEST FORM UPON MY REFERSE IF I WANTED THE COPIES.

12/06/2021

ON SEPTEMBER 10th, 2020 I, JEFFREY

ALLAN SNOWDEN II, WAS ARRESTED AND

DETRINED AT BARRY COUNTY JAIL IN HASTINGS,

MI. AFTER REQUESTING A TRIAL BY JURY,

JUDGE MICHEAL SCHIPPER ORDEDED THAT

I BE EVALUATED FOR COMPETENCY EVEN

THOUGH I STRONGLY OBJECTED. AS I WHITED

FOR THE EVALUATION ON NOVEMBER 6th, 2020

I WAS HELD WITHOUT BOND. AFTER BEING

EVALUATED, JUDGE SCHIPPER DETERMINED

THAT I WAS INCOMPETENT AND ORDERED MY

TRANSFER TO KALAMAZOO PSYCHIATRIC HOSPITAL.

ONCE I ARRIVED AT THE HOSPITAL, I
WAS EVALUATED AND PLACED UNDER THE
CARE OF DR. TATINI, WHO IS A STATE EMPLOYED
PSYCHIATRIST. OVER A PERIOD OF SIX MONTHS
I WAS DIAGNOSED WITH BI-POLAR DISORDER,
POST TRAUMATIC STRESS DISORDER, MAJOR
DEPRESSIVE DISORDER AND ATTENTION DEFELIT
DISORDER. AT THAT TIME I WAS PRESCRIBED
THE FOLLOWING MEDICATIONS: 450 MG WEUBUTRIN,
300 MG LITHIUM INSTANT RELEASE, 900 MG LITHIUM
EXTENDED RELEASE, 400 MG SERDQUEL INSTANT
RELEASE, IT WAS ONLY AFTER BEIN GU

STABILIZED ON THESE MEDICATIONS THAT I WAS DETERMINED TO BE COMPETENT TO STAND TRIAL.

ON MAY 26th, 2021 I WAS RETURNED

TO BARRY COUNTY JAIL UNDER STRICT

ORDERS FROM DR TATINI THAT I CONTINUE

TAKING ALL MEDICATIONS HE PRESCRIBED

IN ORDER TO REMAIN COMPETENT TO STAND

TRIAL. I WAS PROVIDED WITH ALL MEDICATIONS

WITHOUT INCIDENT UNTIL MY RELEASE ON

JULY 22th, 2021. UPON MY RELEASE I WAS ORDERED

BY JUDGE SCHIPPER TO CONTINUE TAKING ALL

MEDICATIONS TO BE COMPLIANT WITH THE TERMS

OF MY PROBRITION.

ON SEPTEMBER 22nd, 2021 I WAS AGAIN ARRESTED AND DENTAINED AT BARRY COUNTY JAIL. UPON BEING DETAINED, I REQUESTED THAT I BE PROVIDED WITH ALL THE MEDICATIONS I WAS ORDERED TO TAKE TO REMAIN COMPLIANT WITH THE TERMS OF MY PROBATION AND COMPETENT TO STAND TRIAL. I INFORMED THE STAFF THAT I PLANNED TO TAKE THE NEW CHARGES TO TRIAL AND THAT I WAS AFRAID JUDGE SCHIPPER WOULD SEND ME BACK TO THE HOSPITAL FOR BEING INCOMPETENT TO STAND TRIAL. AFTER A DAY OR SO

I WAS PROVIDED WITH ALL MEDICATIONS WITH THE EXCEPTION OF THE 900MG LITHIUM EXTENDED RELEASE AND THE ADDERAU 20MG EXTENDED RELEASE.

FOR THE NEXT SEVEN DAYS I WAS LEFT IN
THE DRUNK TANK WITHOUT ANY WAY TO LET
STAFF KNOW ABOUT THE MISSING MEDICATIONS.
ON SEPTEMBER 29th, 2021 I WAS MOVED TO THE
FIENERAL POPULATION WHERE I WAS ARRE TO
ACCESS THE COBRA RESIDENT KIOSK AND KITE
THE MEDICAL STAFF TO INFORM THEM OF THE
DISCREPANCIES. ON OR ABOUT OCTOBER 2nd 2021
I WAS FINALLY SEEN BY THE JAIL NURSE TO
WHICH I EXPLANDED THE MISSING MEDICATIONS
AND WHY IT WAS NOT JUST IMPORTANT BUT
NECESSARY THAT I BE GIVEN ALL PRECCRIBED
MEDICATIONS AS IT WAS CONDITIONAL TO MY
PENGL LOMPETENT TO STAND TRIAL.

IT WAS AT THIS TIME THAT I ALSO
INFORMED THE NURSE OF THE COURT ORDERED
CONDITIONS OF MY PROBATION. I EXPLAINED TO
THE NURSE THAT I WAS REQUIRED TO REMAIN
COMPLIANT WITH THE TERMS OF MY PROBATION
REGISEDLESS OF THE FACT THAT I WAS IN JAIL
AND THAT I COULD BE GIVEN A VIOLATION
IF TO JUDGE SCHIPPER FOUND OUT THAT I WASN'T

TAKING ALL PRESCRIBED MEDICATIONS. GIVEN JUDGE SCHIPPER'S EXTREME BIAS TOWARS ME THROUGHOUT THIS ENTIDE ORDEAL, THIS WAS THE SOURCE OF EXCESSIVE AND UNDUE FEAR FOR MUSELF AS THE SITUATION WAS COMPLETELY OUT OF MY CONTROL.

THE NURSE WAS ACCOMODATING AND MADE
THE CORRECTION TO THE LITHIUM AFTER CONFIRMING
WITH THE PHARM ACY THAT IT HAD BEEN PRESCRIBED
DURING MY PREVIOUS DETENTION AT BARRY
COUNTY JAIL. THE NURSE ALSO CONFIRMED THAT
I HAD BEEN PRESCRIBED THE ADDERALL AND
EXPLAINED TO ME THAT, DUE TO THE CLASSIFICATION
OF THE DRUG, THE PHARMACY REQUIRED A HANDWRITTEN PRESCRIPTION FROM THE DOCTOR. I WAS
INFORMED THAT THE NURSE WOULD CALL THE
DOCTOR THAT AFTER NOON AND ASK HIM TO SEND
THE PROPER PRESCRIPTION TO THE PHARMACY.

I WAITED FOR THE SITUATION TO BE REMEDIED BUT AFTER A WEEK PASSED BY WITHOUT MAY CHANGE, ON OCTOBER 9th 2021 I SENT A KITE TO MEDICAL TO REMIND THE DOCTOR THAT I STILL HAD NOT BEEN GIVEN AIL PRESCRIBED MEDICATIONS. THE NURSE REPLIED WITH THE SAME HAND-WRITTEN PRESCRIPTION EXPLANATION, AT THIS TIME, I STILL HAD NOT BEEN SEEN BY

THE DOCTOR. I CONTINUED TO WAIT PATIENTLY EVEN AS THE SYMPTOMS OF MY UNTREATED MENTAL ILLNESS BEGAN TO TAKE HOLD.

AS I BECAME UNABLE TO CONCENTRATE

ON MY (ASE AND STARTED EXPERIENCING IMPUSSE

CONTROL PROBLEMS, THE FERR OF BRING SENT TO

THE PSYCHIATRIC HOSPITAL BECAME UNDEARCHBLE.

I STARTED HAVING DISTURBING NIGHTMAKES

OF BEING SENT TO PRISON FOR FAILING TO COMPLY

MITH THE TERMS OF MY PROBATION AND WOULD

OFTEN WAKE UP IN COLD SWEAT. ON OCTOBER

13th 2021 I SENT ANOTHER KITE TO MEDICAL

TO REMIND THEM OF THE ISSUE AND TELL THEM

ABOUT THE SYMPTOMS I WAS EXPERIENCING. I WAS

GIVEN THE SAME STORY ABOUT THE HAND WRITTEN

PRESCRIPTION.

BY OCTOBER 215 2021 I WAS STILL BEING DEPRIVED OF MY MENTAL HEALTH MEDICATIONS AND HAD YET TO BE SEEN BY THE JAIL PHYSICIAN. AGAIN I SENT A KITE TO MEDICAL TO REMIND THEM OF THE SITUATION. I WAS INFORMED THAT A DOCTOR WOULD BE PRESENT THAT WEEKEND AS THE JAIL LACKS 24 HOUR MEDICAL CARE. ON OCTOBER 24th 2021 I WAS FINALLY SEEN BY DR. WALTER ALBRECHT AFTER BEING DETAINED FOR OVER A MONTH. HE CHECKED MY WEIGHT AND YITALS AND THEN ASKED WHY I WANTED TO SEE HIM AS IF HE WAS UN AWARE OF THE MONTH LONG LIST OF KITES I HAD SENT HIM.

WHEN I TOLD HIM ABOUT THE PROBLEM WITH MY MENTAL HEALTH MEDICATION AND THAT I ASKED TO SEE HIM TO GET THE PRESCRIPTION FILLED, HE VERY STEPNLY REPLIED WELL, IT'S NOT GIOING TO." HE WAS VERY CONDESCENDING AND EVEN AFTER I EXPLAINED TO HIM THAT THERE WAS A COURT ORDER INVOLVED HE CONTINUED TO REFUSE ANOTOLD ME TO GET ANOTHER DOCTOR TO SIGN IT. I BEGAN TO PLEAD WITH HIM TO UNDERSTAND MY SITUATION BUT HE ONLY STARTED TO SHOUT AT ME. AT THIS TIME THE SERGEANT ON DUTY INTERVENED.

ONCE THE ISSUE WITH DR. ALBRECT HAD

CHLMED DOWN I WAS INFORMED THAT THERE

WAS A DIFFERENT JAIL PHYSICIAN NAMED

DR. ANDREW MESSENGER, I WAS ALSO TOLD

THAT DR. MESSENGER HELD THE MEDICAL LISTENSE

FOR THE JAIL BUT THAT HE VERY RARELY CAME

TO THE JAIL TO SEE INMATES. I WAS ASSURED

HE WOULD BE INFORMEDAND THAT THE PROBEM

WOULD BE RESOLVED. AT THAT TIME I DEQUESTED

TO SEE DR. MESSENGER AND WAS TOUD I WOULD

BE ABLE TO SEE HIM AS SOON AS POSSIBLE DUE TO THE SCRIOLINESS OF THE SITUATION.

ON NOVEMBER 15, 2021 I STILL HAD NOT BEEN SEEN BY DR. MESSENBER AND THE PROPLEM WITH MY MENTAL HEALTH MEDICATION WAS STILL UNRESOLVED. I SENT ANOTHER KITE TO MEDICAL EMPHASIZING THE IMPORTANCE OF THE ISSUE AS I HAD A COURT HEARING COMING UP WITHIN THE WEEK, ONCE AGAIN I WAS MET WITH THE REPLY OF "THE DOCTOR STILL NEEDS TO SIGN," IT WAS AT THIS TIME THAT I LET MY PUBLIC DEFENDANT, SHANE HENRY, KNOW WHAT WAS HAPPENING. I ASKED HIM TO HAVE JURGE SCHIPPER INTERVENE.

ON NOVEMBER 3PP 2021 | FINALLY HAD ENOUGH AND FILED A GILLEVANCE WITH THE JAIL.

THE REPLY TO THE GIRLEVANCE WAS THAT I NEEDED TO KITE MEDICAL ABOUT THE PRODUCEM.

AT THIS POINT I BECAME SEVEREY DISTRESSED AND DISCOURAGED BECAUSE IT FEIT LIKE THERE WAS NO OPTIONS LEFT FOR HELP SO LONG I AS I WAS A PRISONER AT BARRY COUNTY JAIL. I HAD DONE EVERY THING I HAD BEEN INSTRUCTED TO DO BY JAIL STAFF WITH NO RESOLUTION.

I COULDN'T EVEN GIET JUDGE SCHIPPER, WHO OPDERED ME TO BE ON THE MEDICATION, TO HELP.

I INCREBSINGLY BECAME TERRIFIED OF BEING HELD WITHOUT DUE PROCESS IF I WAS SENT BACK TO THE PSYCHIATRIC HOSPITAL ABIAN.
FOR NOT BEING ON ALL THE MEDICATIONS I AM REQUIRED TO BE TAKING TO BE COMPETENT TO STAND TRIAL. ON NOVEMBER 9th 2021 I SENT ONE LAST KITE TO PLEAD WITH THEM ONE LAST TIME. THIS TIME MY KITE WENT COMPLETELY I GNORED.

AS OF THIS WRITING ON DECEMBER 14, 2021

I STILL HAVE NOT BEEN SEEN BY DR. MESSENGER

NOR HAVE I BEEN GIVEN ALL THE MEDICATIONS

REQUIRED FOR COMPETENCY DESPITE JUDGE SCHIPTER

HOLDING A PROBATION VIOLATION HEARING AGAINST

ME WHILE I AM INCOMPETENT BY THE JUDGE'S OWN

ORDER. I HAVE SUFFERED SEVERE ANXIETY, FEAR

AND MENTAL ANGUISH UNNECESSAYOLY AT THE

HANDS OF THESE MEN AND THIS FACILITY AND

HAVE BEEN TREATED AS IF IAM SUB-HUMAN AND

THAT I DON'T DESERVE TO BE GIVEN THE SAME

MEDICAL TREATMENT AS ANY OTHER U.S.

CITIZEN SIMPLY BECAUSE I AM REING HELD

PRISONER. I HUMBLY ASK THAT THE COURT

HEARS MY CASE AND PLEAFOR DEGLEEF.

RESPECT FULLY SUBMITTED,

IV. Relief

State briefly and precisely what you want the court to do for you.

I FIRST REQUEST DUNITIVE DAMAGES AGAINST THE
DEFENDANTS SO THAT THIS WON'T HAPPEN TO ANOTHER
PERSON IN THIS COUNTY, SECOND, I ASK THAT I BE
OF \$10,000,000 "00 FOR THE FEAR, HUMILIATION AND
EXTREME MENTAL ANGUISH I HAVE SUFFERED AT
THE HANDS OF THESE MEN. THANK YOU.

V. Notice to Plaintiff Regarding Consent

In accordance with the provisions of 28 U.S.C. § 636(c) and Federal Rule of Civil Procedure 73, you are hereby notified that the United States magistrate judges of this district court may, upon your consent, conduct any or all proceedings in this case, including a jury trial and entry of a final judgment. If you consent, any appeal from a judgment entered by a magistrate judge shall be taken directly to the United States Court of Appeals for this judicial circuit in the same manner as an appeal from any other judgment of a district court.

Magistrate judges have greater flexibility in their schedules than district judges, who have heavy criminal caseloads that take priority over civil trials. Accordingly, the magistrate judges are generally able to schedule prisoner civil rights cases for jury trial much sooner, and they are able to provide firm trial dates. Magistrate judges are experienced trial judges who handle a great number of prisoner civil rights cases.

Your decision to consent to the dispositive jurisdiction of a United States magistrate is entirely voluntary. If you do not consent to a magistrate judge, the case will be randomly assigned to a district judge. The magistrate judge already assigned to this case would continue to decide all pretrial matters and would handle all dispositive motions by report and recommendation.

Please check **ONE** box below to indicate whether you voluntarily consent to proceed with a United States magistrate judge or if you would instead prefer that the case be assigned to a district judge.

I hereby voluntarily consent to the United States magistrate judge conducting all proceedings in this case, including entry of a final judgment and all post-judgment matters.

☐ I request that this case be assigned to a district judge.

12/06/2021 Date

Signature of Plaintiff

NOTICE TO PLAINTIFF(S)

The failure of a *pro* se litigant to keep the court apprised of an address change may be considered cause for dismissal.

J. SNOWIZEN 1212 W. STATE ST. HASTINGS, MI 49058

CLERK OF THE UNITED STATES
DISTRICT COURT
399 FEDERAL BUILDING
110 MICHIGAN ST., NW
GRAND RAPIDS, MI 49503

